U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Blvd
Chicago, IL 60604

RCRA SITE SCREENING INSPECTION REPORT
Enforcement Confidential – Deliberative Process

SITE NAME:	**Canton Drop Forge**
EPA ID NUMBER:	**OHD004465142**
ADDRESS:	**4575 Southway Street S.W. Canton, Ohio 44706**
DATE OF INSPECTION:	**July 1, 2011**
EPA INSPECTOR:	**Michael Beedle**

PREPARED BY: _____ 7/25/11
Michael Beedle **Date**

ACCEPTED BY: _____ 7/27/11
Paul Little, Chief, CS2 **Date**

Purpose of Inspection

This inspection was a site screening inspection of Canton Drop Forge. This inspection was to determine if the site should be considered for full inspection. The site was identified for the screening inspection through a review of National Response Center (NRC) reports of releases in the Canton, Ohio, area. One report NRC received was for oiled geese. See Attachment A for this NRC report. Review of aerial photographs of area, where the geese were found, indicated that Canton Drop Forge had three surface impoundments. The aerial photographs indicated that two of the impoundments were dark in color, similar to other oily impoundments found at the WCI Steel matter. One of the impoundments appeared clean and clear of oil. See an annotated aerial photograph of the site in Attachment B.

Participants

Inspector:
Michael Beedle, Environmental Scientist, EPA

Representative of Canton Drop Forge:
Keith Houseknecht, Manager, Plant Engineering

Introduction

I arrived at the site at approximately 8:45 AM. I introduced myself, presented my inspector credentials, provided a business card, and described the purpose and the process of the inspection. I explained that I wanted to observe the site's surface impoundments. Mr. Houseknecht provided a brief verbal description of the site and led the tour.

Site Description

Canton Drop Forge is a forging plant. It receives bars of steel in various shapes and diameters. The bars can be square, round or rectangular; are from 4 to 15 inches in diameter; and are up to 20 feet long. The site first cuts the bars to size. The cut piece is heated and then put into the die cavity. There is a top and bottom die that hit together until the piece fits. The piece is removed from the die and excess material is removed by hand grinding. The site uses petroleum based lubricants in its processes. Mr. Houseknecht said that the used oil that the site generates is sent offsite.

The site manufactures its own dies. The site does not pickle steel. It does clean out lime from recirculation lines every couple years with acid. It sends its scrap steel to Timken Steel for recycling. The site uses alloy steel that contains some chrome. Mr. Houseknect said that forgings are stronger than castings and that forgings have grain flow. Mr. Houseknect said the forgings are made for rail engines and windmill components. Its website states that it serves aerospace, locomotive, oilfield, power generation and other industries (www.cantondropforge.com). Canton Drop Forge has approximately 330 employees.

The site has notified as a small quantity generator of hazardous waste. It has a Title V air permit. For the Toxic Release Inventory, the site reported that it transferred offsite 120,000 pounds of chromium in 2009.

Site Tour

We toured the site observing a sump, drums, totes, two skimmers, two tanks, and three surface impoundments. I took photographs of these items during the inspection. See the photographs in Attachment C.

We started the tour walking to Pond 1. Photograph 1 is of sump and skimming operations before Pond 1. It is believed that the sump is prior to the plant water being discharge to Pond 1. We continued to Pond 1. I observed flagging and netting on the pond. The whole surface of the pond was covered in black oil. The banks were stained by oil. Mr. Houseknect said the netting and flags were put above the pond to prevent geese landing on it. He said the flags were put on in the spring (2011) and the netting in the fall (2010). He said the netting has to be replaced occasionally. I took photographs of Pond1 (photographs 2-5). Pond 1 is pumped to Pond 2. Photograph 6 is the pump used for the transfer. The pump did not appear to be running at the time of the inspection.

Additionally, Mr. Houseknect said that the oil is occasionally pumped off of Pond 1 and is recycled. He said it is pumped out once every five years. He said the pond is clay lined and it receives storm runoff.

We walked to Pond 2. I observed a couple of waste piles north of Pond 1 between two buildings. Mr. Houseknect said the material was scale from steel and bricks. He said the material is land-filled. He said the waste was tested and it was non-hazardous waste.

I noticed the smell of oil as we arrived at Pond 2. There were flags and netting on the pond. Mr. Houseknect said the netting was placed on the pond last year (fall 2010) and flags this year (spring 2011). See photographs 7-10 and 17 -26 of Pond 2. Mr. Houseknect said Pond 2 receives water from Pond 1, drains, down spouts, cooling water and surface water. He said it has more oil than Pond 1 and that is why Canton Drop Forge skims and pumps oil off Pond 2.

Photographs 7-10 were taken from the west bank of Pond 2 facing east. Photographs 9 and 10 are of trench and hose coming out of Pond 2. The trench had oil in it and was oil stained. As we walked the southern perimeter of the pond, I noticed three 275-gallon totes containing oil (photographs 11-12) and ten 55-gallon red drums staged (photograph 13). At least one of the 55-gallon drums was marked "used". I explained there is a regulatory requirement to label or mark used oil containers "Used Oil".

Continuing to the southeast corner there were approximately 37 55-gallon black drums (photographs 14-16). The drums for the most part contained liquid when I attempted to move them but a few seemed to have only a small amount of fluid in them. Approximately eight drums were marked "Dirty Oil" and two were marked "Used Oil". Photograph 16 is of animal tracks (raccoon) near the black drums.

There was a skimmer on the southeast corner of Pond 2. The skimmed oil was placed into a tank. The oil is then placed into containers or totes for shipment offsite. Photographs 17, 19, and 23-26 show the skimmer and associated equipment. Photographs 17-18 show a pump and hose used to remove used oil from Pond 2. Photographs 20-22 are of the north east bank of Pond 2. This bank had heavy oil staining and the pond was not fully netted. Photographs 24 and 25 are of tanks

associated with the skimming. The tanks were not labeled or marked used oil. Mr. Houseknect said the skimmer is run occasionally. Pond 2 is pumped to Pond 3.

We continued the tour walking to Pond 3. The area was well vegetated. I did not notice any oil on the surface of Pond 3. Photograph 27-30 are of Pond 3. Photograph 27 is of water coming into Pond 3 from Pond 2 We walked back to my car in the parking lot to conclude the inspection and tour. As we walked back I noticed various waste and material piles located on the northeast side of the facility. Mr. Housknect said the plant recently switched from burning coal to using natural gas as a fuel. The inspection concluded at approximately 10:15 AM.

Follow-up with U.S. Fish and Wildlife

I placed a call to Mr. Erryl C. Wolgemuth, Special Agent with the U.S. FWS on July 15, 2011. He said he thought that U.S. FWS had been to the site previously about the time of the report of oiled geese. He said he thought that the Ohio DNR had Canton Drop Forge place the netting and flags on the ponds in response to the oiled geese report. I sent Mr. Wolgemuth photograph 5 in which appeared to be an oiled bird caught in the netting.

Recommendations

A used oil managed in surface impoundment prohibition case should be developed for this site. A full Compliance Evaluation Inspection (CEI) is recommended for the site. Alternatively information requests can be used to develop a case related to Pond 1 and Pond 2 used oil management. The advantages of a CEI are that a full review of plant operations and oil use can be done. All of the potential used oil drums and tanks can be observed and determined if they were managing used oil. Further the depth of used oil in the impoundments could be potentially determined. Disadvantages of a CEI include the cost of travel and equipment needed to fully evaluate the site and an increase of time to do the work.

The advantages of an information request based investigation include the cost and the quickness the site could be possibly addressed. Disadvantages include that it is easy for a company to mislead in information request response where there is only a relatively small amount of field information to verify the response.

In past oily impoundments cases, a 7003 Order has been issued to force a company to remove or control oil exposure to wildlife. This site has nets and flags on the impoundments in question to control exposure. However the nets are in the oil therefore do not control exposure. These past orders were issued to sites where we could not use the used oil prohibition against managing used oil in surface impoundments. At this time, I believe that 3008a Complaint can be issued to force to removal of all oil and go through closure of the impoundments at this site.

Attachments

A. NRC Report
B. Annotated Aerial Photograph
C. Photographs

ATTACHMENT A

NRC Report

NATIONAL RESPONSE CENTER 1-800-424-8802
*** For Public Use ***
Information released to a third party shall comply with any
applicable federal and/or state Freedom of Information and Privacy Laws

Incident Report # 905898

INCIDENT DESCRIPTION

*Report taken at 20:46 on 17-MAY-09
Incident Type: UNKNOWN SHEEN
Incident Cause: UNKNOWN
Affected Area: STREAM
Tha incident was discovered on 15-MAY-09 at 17:30 local time.
Affected Medium: WATER

SUSPECTED RESPONSIBLE PARTY

CANTON, OH 44706

Type of Organization: PRIVATE ENTERPRISE

INCIDENT LOCATION

SOUTHWAY MINI STORAGE County: STARK
4841 SOUTHWAY SW
CANTON
City: CANTON State: OH Zip: 44706
Distance from City: 0 MILES
Direction from City: NW

UNKNOWN SHEEN

RELEASED MATERIAL(S)

CHRIS Code: OUN Official Material Name: UNKNOWN OIL
Also Known As:
Qty Released: 1 UNKNOWN AMOUNT Qty in Water: 1 UNKNOWN AMOUNT

DESCRIPTION OF INCIDENT

TWO OILED GEESE, ONE VERY SEVERELY SO AS IF SHE HAD BEEN IN A LOT OF OIL WERE DISCOVERED AT THE ADDRESS BELOW. THE STREAM HAS OILY RESIDUE THE INCREASES DOWNSTREAM. THE SOURCE IS UNKNOWN AT THIS TIME BUT IT IS SUSPECTED THAT IT IS NOT FROM THE MINI STORAGE.

INCIDENT DETAILS

Platform Rig Name:
Platform Letter:
Location Area ID:
Location Block ID:
OCSG Number:
OCSP Number:
State Lease Number:
Pier Dock Number:
Berth Slip Number:

---SHEEN INFORMATION---
Sheen Color: SILVERY
Sheen Odor Description:
Sheen Travel Direction:
Sheen Size Length:
Sheen Size Width:
---WATER INFORMATION---
Body of Water: STREAM
Tributary of: NOT LISTED
Nearest River Mile Marker:
Water Supply Contaminated: YES

DAMAGES

Fire Involved: NO Fire Extinguished: UNKNOWN
INJURIES: NO Hospitalized: Empl/Crew: Passenger:

FATALITIES: NO Empl/Crew: Passenger: Occupant:
EVACUATIONS: NO Who Evacuated: Radius/Area:

Damages: NO

Closure Type	Description of Closure	Length of Closure	Direction of Closure
Air: N			
Road: N			Major Artery: N
Waterway: N			
Track: N			

Passengers Transferred: NO
Environmental Impact: UNKNOWN
Media Interest: NONE Community Impact due to Material:

REMEDIAL ACTIONS

UNKNOWN
Release Secured: UNKNOWN
Release Rate:
Estimated Release Duration:

WEATHER

Weather: UNKNOWN, °F

ADDITIONAL AGENCIES NOTIFIED

Federal: NONE
State/Local: NONE
State/Local On Scene: NONE
State Agency Number: NONE

NOTIFICATIONS BY NRC

ATLANTIC STRIKE TEAM (MAIN OFFICE)
17-MAY-09 21:13
USCG HSOC AT DHS (USCG HSOC DESK)
17-MAY-09 21:13
USCG ICC (ICC ONI)
17-MAY-09 21:13
INFO FOR CRITICAL MFG SECTOR (MAIN OFFICE)
17-MAY-09 21:13
DOT CRISIS MANAGEMENT CENTER (MAIN OFFICE)
17-MAY-09 21:13
U.S. EPA V (MAIN OFFICE)
17-MAY-09 21:58
FEDERAL EMERGENCY MANAGEMENT AGENCY (MAIN OFFICE)
17-MAY-09 21:13
INFO ANALYSIS & INFRA PROTECTION (MAIN OFFICE)
17-MAY-09 21:13
NATIONAL INFRASTRUCTURE COORD CTR (MAIN OFFICE)
17-MAY-09 21:13
NATIONAL INFRASTRUCTURE COORD CTR (INFRASTRUCTURE PROTECTION)
17-MAY-09 21:13
NOAA RPTS FOR OH (MAIN OFFICE)
17-MAY-09 21:13
OHIO DEPARTMENT OF HEALTH (OHDOH)
17-MAY-09 21:13
HOMELAND SEC COORDINATION CENTER (MAIN OFFICE)
17-MAY-09 21:13
SECTOR OHIO VALLEY (COMMAND CENTER)
17-MAY-09 21:13
OH EPA ATTN: DUTY OFFICER (MAIN OFFICE)
17-MAY-09 21:13

WEB REPORT (WEB REPORT SUBMITTER)
17-MAY-09 21:13

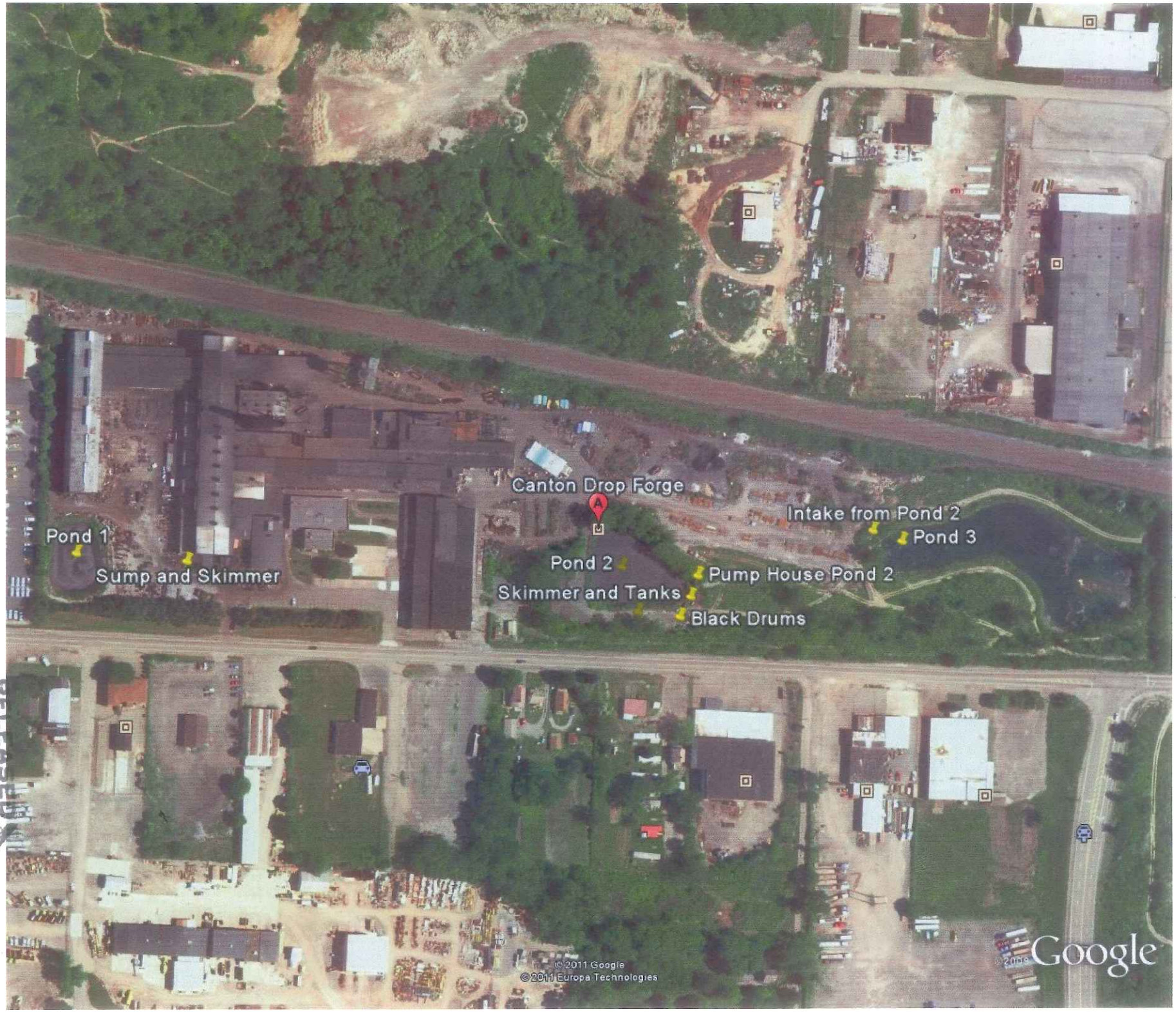
ADDITIONAL INFORMATION

NO ADDITIONAL INFORMATION.

*** END INCIDENT REPORT # 905898 ***

ATTACHMENT B

Annotated Aerial Photograph



RELEASED
DATE 08/05/2012
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ATTACHMENT C

Photographs

Canton Drop Forge
Photograph Log
Screening Inspection on July 1, 2011
Photographs by Michael Beedle

Photo	Description
1	Sump with skimmer prior to Pond 1. Tote on pallet.
2	Pond 1. Southwest side of facility. Oil over the entire surface of the pond. Netting and flags over pond to keep geese from landing. Heavily vegetated area. Taken from the east side of the pond facing west.
3	Pond 1. Facing northwest. Netting can be seen in the oil.
4	Pond 1. East bank of pond.
5	Pond 1. Facing northwest. Netting can be seen in the oil.
6	Pump used to transfer material from Pond 1 to Pond 2. Pump was not running at the time of the inspection.
7	Pond 2. Near the middle-south side of facility. Oil over the entire surface of the pond. Netting and flags over pond to keep geese from landing. Heavily vegetated area. Taken from the west side of the pond facing east. Netting can be seen in the oil.
8	Pond 2. Facing southeast. Netting can be seen in the oil. Pond netted and flagged.
9	Trench on west (southwest) side of Pond 2. A hose runs out of this trench and there was oil and oil staining in the trench. See photograph 10 of the hose.
10	Hose coming out of Pond 2 on west (southwest) side.
11	Two Totes. South side of Pond 2. Totes are ~ 275-gallon and were mostly full. Three full totes in the area, see Photograph 12 for the third tote.
12	Two Totes. South side of Pond 2. Totes are ~ 275-gallon and were mostly full. Three full totes in the area, see Photograph 11 for the third tote.
13	Ten 55-gallon red drums. South side of Pond 2. At least one of the drums had the word "used" on it. Thought to contain used oil.
14	37 55-gallon black drums. Southeast side of Pond 2. Eight drums labeled dirty. Two drums labeled used oil. Some seemed full others while others had various volumes of liquid.
15	Black drums same as Photograph 37. Totes seem in the background of this photograph were empty and not the same as photographs 11-12.
16	Raccoon tracks near the black drums on the Southeast side of Pond 2.
17	Pond 2 facing northwest from the southeast corner. Rope skimmer not operating at the time of the inspection. Pump and hose. Hose into the pond.
18	Pump and hose in southeast corner of Pond 2. Oil stained area.
19	Rope skimmer at southeast corner of Pond 2.
20	Pond 2 northeast corner. Net is not covering the whole pond.
21	North bank of Pond 2. Heavily oiled stained. Dead vegetation.
22	North bank of Pond 2. Heavily oiled stained. Dead vegetation.
23	Rope skimmer in Pond 2.
24	Tank and rope skimmer apparatus at Pond 2.
25	Two tanks at Pond 2, southeast corner.
26	Rope skimmer, SE corner of Pond 2.
27	Pond 3, where water is received from Pond 2. Northwest corner of Pond 3.
28	Pond 3, looking east from west bank.
29	Pond 3, looking southeast.
30	Pond 3, looking southeast.

Canton Drop Forge Photo 01, by Mike Beedle ,2011/07/01 07:22:55

Canton Drop Forge Photo 02, by Mike Beedle ,2011/07/01 07:24:58

Canton Drop Forge Photo 03, by Mike Beedle ,2011/07/01 07:27:32

Canton Drop Forge Photo 04, by Mike Beedle ,2011/07/01 07:28:35

Canton Drop Forge Photo 05, by Mike Beedle ,2011/07/01 07:28:42

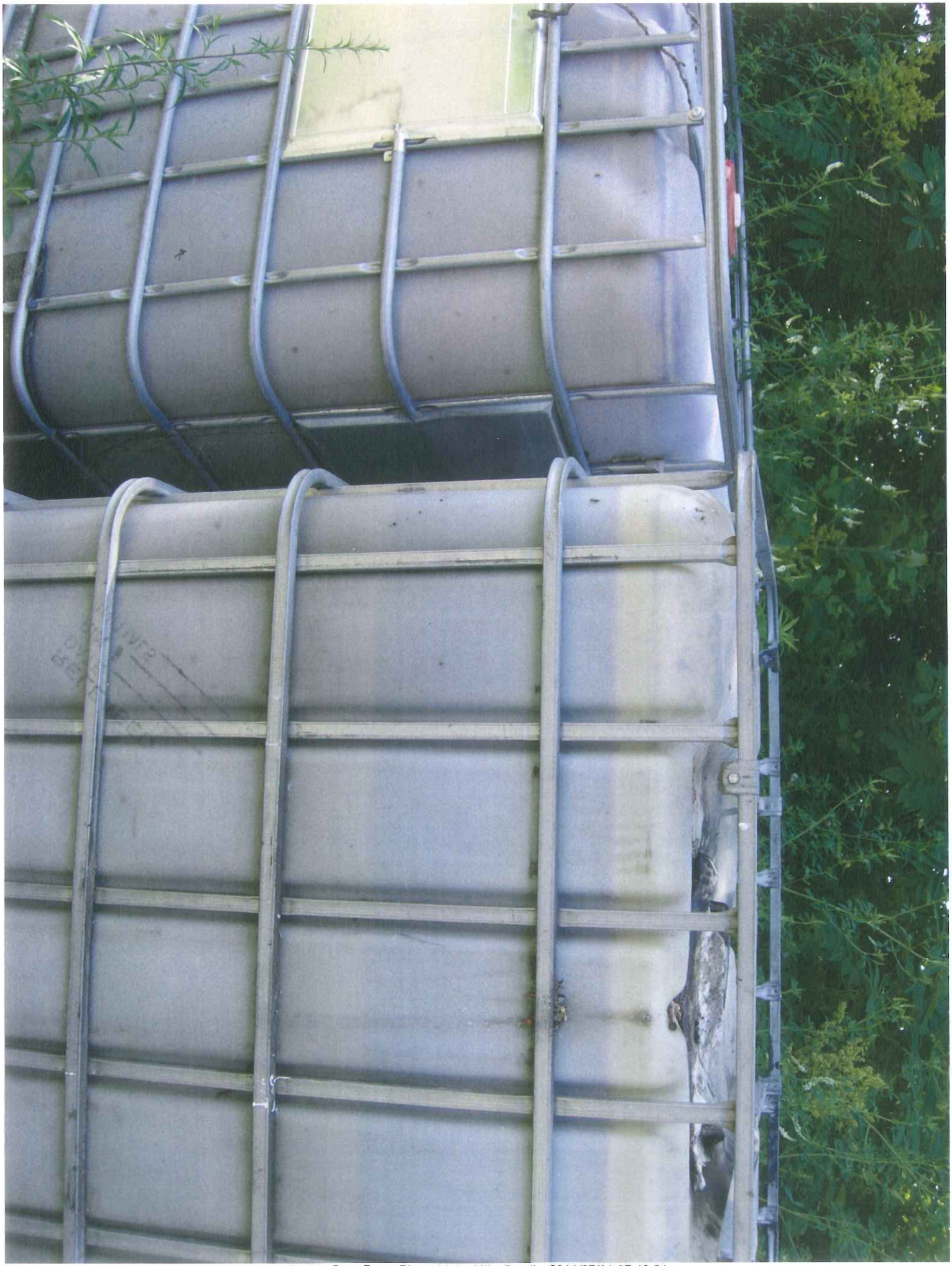
Canton Drop Forge Photo 06, by Mike Beedle ,2011/07/01 07:29:01

Canton Drop Forge Photo 07, by Mike Beedle ,2011/07/01 07:38:05

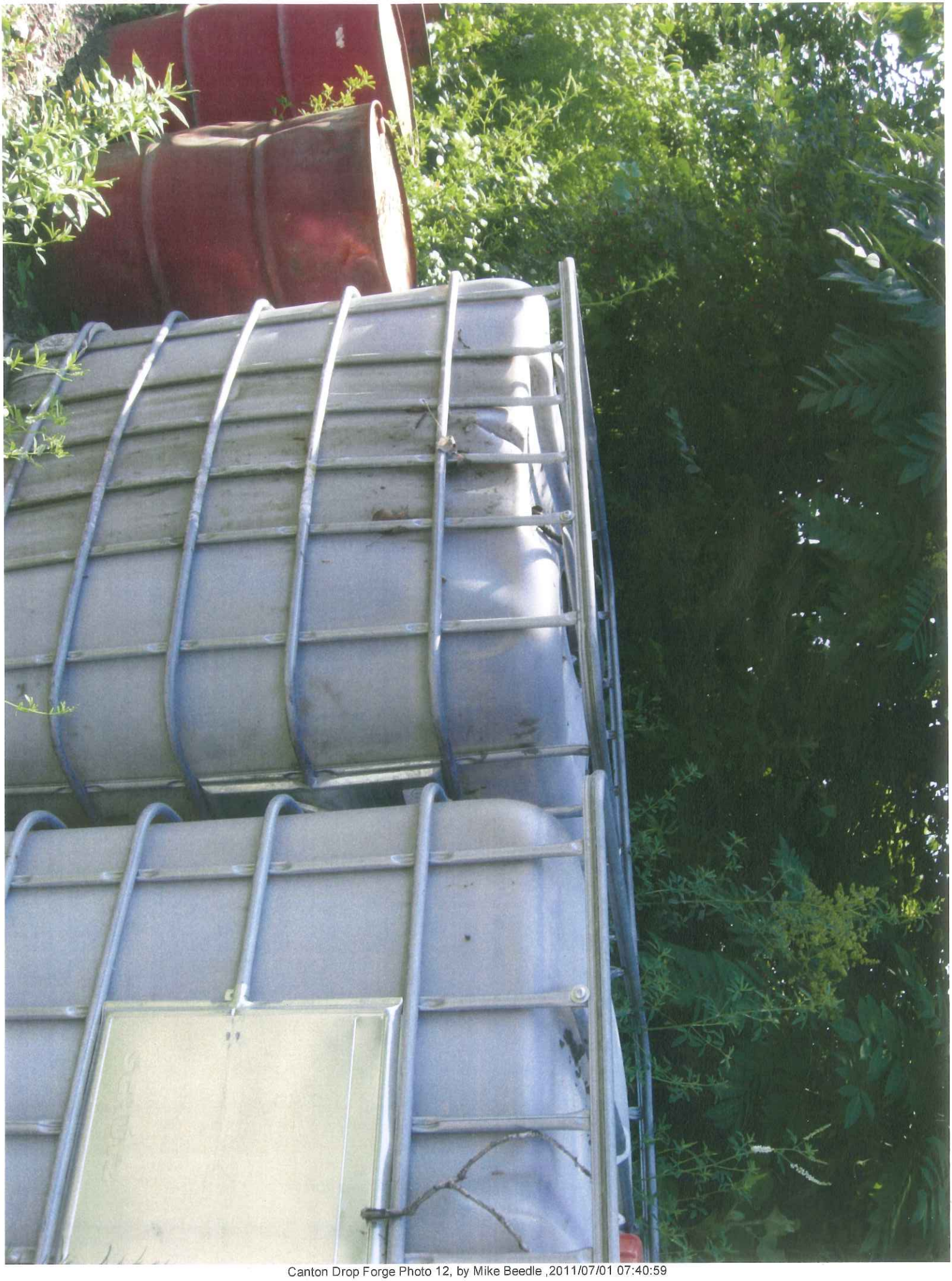
Canton Drop Forge Photo 08, by Mike Beedle ,2011/07/01 07:38:09

Canton Drop Forge Photo 09, by Mike Beedle ,2011/07/01 07:39:06

Canton Drop Forge Photo 10, by Mike Beedle ,2011/07/01 07:39:13



Canton Drop Forge Photo 11, by Mike Beedle ,2011/07/01 07:40:54

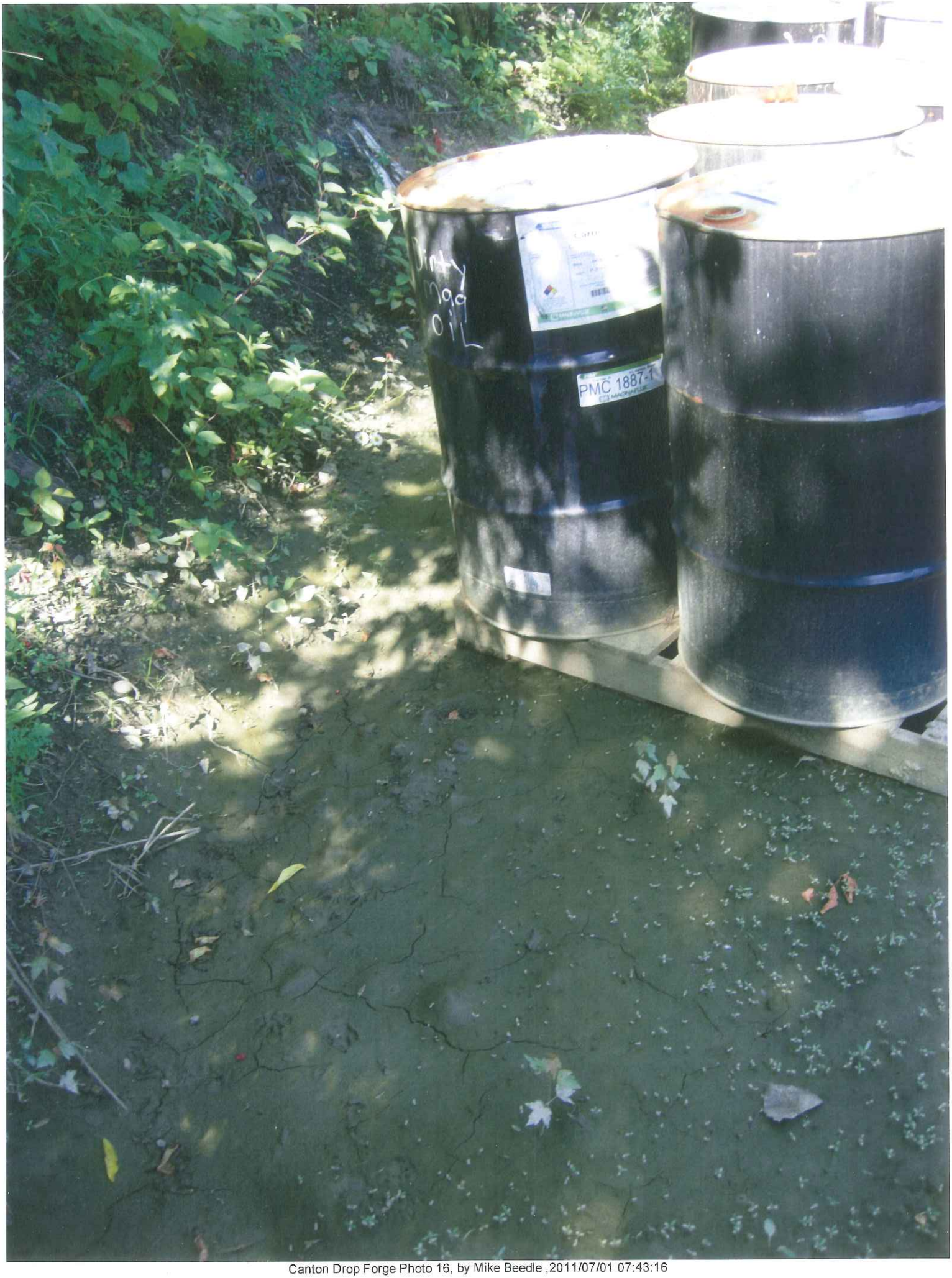


Canton Drop Forge Photo 12, by Mike Beedle ,2011/07/01 07:40:59

Canton Drop Forge Photo 13, by Mike Beedle ,2011/07/01 07:41:58

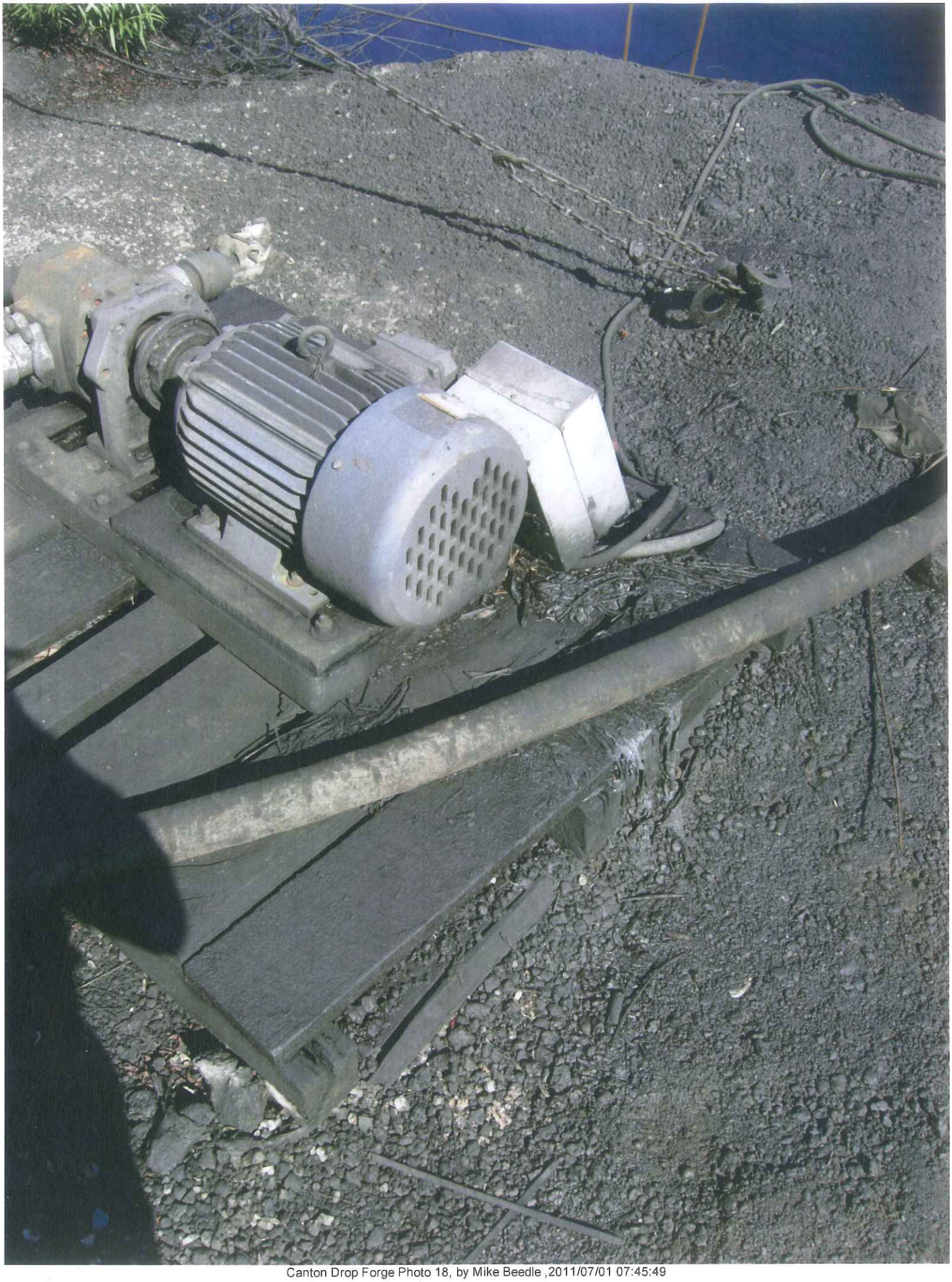
Canton Drop Forge Photo 14, by Mike Beedle ,2011/07/01 07:42:54

Canton Drop Forge Photo 15, by Mike Beedle ,2011/07/01 07:43:12



Canton Drop Forge Photo 16, by Mike Beedle ,2011/07/01 07:43:16

Canton Drop Forge Photo 17, by Mike Beedle ,2011/07/01 07:45:44



Canton Drop Forge Photo 18, by Mike Beedle ,2011/07/01 07:45:49

Canton Drop Forge Photo 19, by Mike Beedle ,2011/07/01 07:45:54

Canton Drop Forge Photo 20, by Mike Beedle ,2011/07/01 07:46:29

Canton Drop Forge Photo 21, by Mike Beedle ,2011/07/01 07:46:36

Canton Drop Forge Photo 22, by Mike Beedle ,2011/07/01 07:46:42

Canton Drop Forge Photo 23, by Mike Beedle ,2011/07/01 07:47:13

Canton Drop Forge Photo 24, by Mike Beedle ,2011/07/01 07:47:24

Canton Drop Forge Photo 25, by Mike Beedle ,2011/07/01 07:47:27

Canton Drop Forge Photo 26, by Mike Beedle ,2011/07/01 07:47:34

Canton Drop Forge Photo 27, by Mike Beedle ,2011/07/01 07:49:53

Canton Drop Forge Photo 28, by Mike Beedle ,2011/07/01 07:49:59

Canton Drop Forge Photo 29, by Mike Beedle ,2011/07/01 07:50:03

Canton Drop Forge Photo 30, by Mike Beedle ,2011/07/01 07:50:08